

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

-----X	:	
UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	
	:	
-against-	:	Criminal No. 1:19-cr-10080-NMG
GREGORY COLBURN, ET AL,	:	
	:	
Defendants.	:	
	:	
-----X	:	

**NONPARTY UNIVERSITY OF SOUTHERN CALIFORNIA’S
MOTION FOR LEAVE TO FILE (UNDER SEAL) AN OPPOSITION TO DEFENDANT
JOHN WILSON’S *EX PARTE* SUPPLEMENT TO HIS MOTION TO COMPEL**

Nonparty University of Southern California (“USC”) hereby moves the Court for leave to file an Opposition to Defendant John Wilson’s Sealed Supplement to his Motion to Compel. As grounds for this Motion, USC states that Wilson’s *Ex Parte* Supplement to his Motion to Compel raises new issues that USC has not briefed for the Court, and states facts that USC seeks to contest.

Because the defendant sought and was granted leave to file his *Ex Parte* Supplement to his Motion to Compel under seal, USC also seeks leave to file its Opposition and any further pleadings regarding the Motion to Compel under seal as well.

WHEREFORE, USC respectfully requests that this Court allow it leave to file its Opposition under seal.

Respectfully submitted,

UNIVERSITY OF SOUTHERN CALIFORNIA,
By its attorneys,

/s/ Debra Wong Yang

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Dated: November 10, 2020

CERTIFICATE OF SERVICE

I, hereby certify that this document filed through ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent those indicated as nonregistered participants on November 10, 2020.

/s/ Anthony E. Fuller

Anthony E. Fuller